

Basic

~~CONFIDENTIAL~~**ROUTING AND RECORD SHEET**

SUBJECT: (Optional)

Review of the Update on Computer Security Legislation

FROM:

C/ISG/OS

EXTENSION

NO.

DATE

26 NOV 1985

TO: (Officer designation, room number, and building)

DATE

RECEIVED

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OFFICER'S INITIALS

COMMENTS (Number each comment to show from whom to whom. Draw a line across column after each comment.)

1. ADD/TS

2 DEC 1985

12/3

CJH

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26 NOV 1985

MEMORANDUM FOR: Chief, Policy Branch, Policy & Plans Group

VIA: Associate Deputy Director of Security (TS)

FROM: [REDACTED]

Information Security Group, OS

SUBJECT: Review of the Update on Computer Security
Legislation [REDACTED]REFERENCE: Memo for Multiple fm LD/OLL, dtd 4 Nov 85,
Subject: Update on Computer Security
Legislation

1. The Information Security Group (ISG) has reviewed the update to the legislation concerning computer security. In reference to Section 5 of the bill, which describes the mandatory training requirements for Federal agencies, ISG agrees with [REDACTED] comments in paragraph 4 of his cover memo and with the original position taken by the Agency, which was stated in the 19 September 1985 letter to Congressman Brooks. The Agency must be able to continue its own strict mandatory training program in computer security, which is more rigorous and stringent than other government agencies. As long as the bill imposes minimum standards only for training, it should not affect the current Agency training procedures. [REDACTED]

2. In reference to Section 6 of the bill, ISG would have serious reservations with providing copies of ADP security plans for the Agency's unclassified systems to NBS and NSA for advice and comment, with an approval/disapproval action by GSA. The major unclassified system in the Agency is the IBM/VMU system residing in the [REDACTED] Center, which requires specific procedures (i.e., confirmation of valid user access by system call-back) for allowing system access. In addition to that system, there are a number of personal computers that are used throughout various Agency components in an "unclassified" stand-alone mode. ISG and OIT/Computer Security Group have significant concerns about the procedures for access and control of these unclassified systems, and monitor them to the greatest extent possible. However, ISG believes that it would not be in

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the best interest of the Agency to publish and disseminate the access and control procedures for these systems, particularly to uncontrolled environments within multiple agencies. [redacted]

3. As a matter of interpretation, [redacted] indicated that the Agency was exempt from Section 5 of the bill because the Agency is exempt from the provisions of Section III of the Federal Property and Administration Act of 1949. This same Act is referenced in Section 6 of the bill. Is the Agency, therefore, exempt from Section 6? [redacted]

4. If you have further questions, please call me on [redacted]. [redacted]

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